

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17-BK-3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth, ERS, and PBA.

**ORDER GRANTING FIVE HUNDRED TWELFTH OMNIBUS
OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF
PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF
THE COMMONWEALTH OF PUERTO RICO, AND THE PUERTO RICO BUILDINGS
AUTHORITY TO DUPLICATE CLAIMS**

*Upon the Five Hundred Twelfth Omnibus Objection (Non-Substantive) of the
Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the
Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Duplicate*

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Claims [ECF No. 22245] (the “Five Hundred Twelfth Omnibus Objection”)² of the Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth and ERS, the “Debtors”), dated September 16, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Five Hundred Twelfth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Twelfth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Twelfth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the columns titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Twelfth Omnibus Objection (collectively, the “Claims to Be Disallowed”) being duplicative of the claims identified in the columns titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Five Hundred Twelfth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Twelfth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Five Hundred Twelfth Omnibus Objection is GRANTED as set forth herein; and it is further

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Twelfth Omnibus Objection.

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Remaining Claims is reserved; and it is further

ORDERED that Kroll is authorized and directed to delete the Claims to Be Disallowed from the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22245 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Twelfth Omnibus Objection

Five Hundred Twelfth Omnibus Objection

Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	AGRONT MENDEZ, LILIA M 26 REPARTO BONET AGUAGA, PR 00602	05/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	23492	\$43,232.30	AGRONT MENDEZ, LILIA M. REPARTO BONET 26 AGUADA, PR 00602	05/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	30654	\$43,232.30
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.										
2	ARRUFAT MARQUEZ, WILLIAM ALTURAS DED VILLA FONTANA CALLE 22 B18 CAROLINA, PR 00985	06/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	73780	\$45,000.00*	ARRUFAT MARQUEZ, WILLILAMS 452 AVENIDA PONCE DE LEON, EDIF. ASOCIACION DE MAESTROS, OFIC. 514 SAN JUAN, PR 00918	05/17/18	17 BK 03283-LTS Commonwealth of Puerto Rico	16089	\$31,449.32*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.										
Claim #73780 also contained on Exhibit A to the 316th Omnibus Claims Objection for Reclassified Claims.										
3	CAMACHO QUINONES, CLARIBEL HC 02 BOX 639 YAUCO, PR 00698	06/22/18	17 BK 03283-LTS Commonwealth of Puerto Rico	35676	\$47,250.00*	CAMACHO QUINONES, CLARIBEL HC 02 BOX 639 YAUCO, PR 00698	06/27/18	17 BK 03283-LTS Commonwealth of Puerto Rico	56646	\$54,450.00*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.										
4	CARDONA MORALES, EUCLIDES REPARTO DURAN 6021 CALLE CIPRES ISABELA, PR 00662-3240	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	77102	\$30,000.00*	CARDONA MORALES, EUCLIDES REPTO DURAN 6021 CALLE CIPRES ISABELA, PR 00662-3240	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	101136	\$30,000.00*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.										
Claim #77102 also contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims.										
Remaining claim #101136 contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims.										

Five Hundred Twelfth Omnibus Objection

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CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
5 CONCEPCION, ANDRES 452 AVE. PONCE DE LEON SUITE 514 SAN JUAN, PR 00918	05/10/18	17 BK 03283-LTS Commonwealth of Puerto Rico	12935	\$41,679.48*	CONCEPCION OQUENDO, ANDRES JOSE A. MORALES ARROYO 452 AVENIDA PONCE DE LEON, EDIF. ASOCIACION DE MAESTROS, OFIC. 514 SAN JUAN, PR 00918	05/15/18	17 BK 03283-LTS Commonwealth of Puerto Rico	12003	\$41,679.48*

Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

6 DE JESUS RIVERA, ANA I # 86 C/E PANEL 19 GUAYAMA, PR 00784	06/22/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	81877	Undetermined*	DE JESUS RIVERA, ANA I. #86 C/E PANEL 19 GUAYAMA, PR 00784	06/26/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	97213	Undetermined*
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

Claim #81877 also contained on Exhibit A to the 337th Omnibus Claims Objection for Reclassified Claims.

Remaining claim #97213 contained on Exhibit A to the 337th Omnibus Claims Objection for Reclassified Claims.

7 EVELYN FELICIANO (GENESIS ROMAN FELICIANO) CALLE ELIAS BARBOSA 40 COTO LAUREL, PR 00780	06/20/18	17 BK 03283-LTS Commonwealth of Puerto Rico	48770	\$95,000.00*	ROMÁN FELICIANO, GENESIS C/O EVELYN FELICIANO RODRIGUEZ (MADRE) 40 CALLE ELÍAS BARBOSA COTO LAUREL PONCE, PR 00780	06/20/18	17 BK 03283-LTS Commonwealth of Puerto Rico	37832	\$65,000.00*
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

Claim #48770 also contained on Exhibit A to the 316th Omnibus Claims Objection for Reclassified Claims.

Five Hundred Twelfth Omnibus Objection

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CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT		NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
8	FELICIANO MORALES, ANDRES EDIF C E M 1409 AVE PONCE DE LEON PDA 20 SAN JUAN, PR 00908	06/07/18	17 BK 03283-LTS Commonwealth of Puerto Rico	61629	Undetermined*		FELICIANO MORALES, ANDRES COLON SANTANA & ASOC. 315 COLL & TOSTE URB. BALDRICH SAN JUAN, PR 00918	06/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	61246	\$6,115.15*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.											
9	LARRIUZ MARRERO, LUIS ZENO GANDIA FRANCISCO JIMENEZ 970 ARECIBO, PR 00612	06/04/18	17 BK 03283-LTS Commonwealth of Puerto Rico	46070	Undetermined*		LARRIUZ MARRERO, LUIS A FRANCISCO JIMENEZ 970 ZENO GANDIA ARECIBO, PR 00612	06/04/18	17 BK 03283-LTS Commonwealth of Puerto Rico	34934	Undetermined*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.											
10	MERCADO SOTO, DANIEL HC-61 BOX 37500 AGUADA, PR 00602	04/27/20	19-BK-05523-LTS Puerto Rico Public Buildings Authority (PBA)	173993	\$73,800.00*		MERCADO SOTO, DANIEL HC-61 BOX 37500 AGUADA, PR 00602	04/27/20	19-BK-05523-LTS Puerto Rico Public Buildings Authority (PBA)	173793	\$73,800.00*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.											
11	ORTIZ PEREZ, DIANA M. URB RIO HONDO I D 39 CALLE RIO CAONILLAS BAYAMON, PR 00961	05/25/18	17 BK 03283-LTS Commonwealth of Puerto Rico	23420	\$12,000.00*		ORTIZ PEREZ, DIANA M. URB RIO HONDO I D 39 CALLE RIO CAONILLAS BAYAMON, PR 00961	05/25/18	17 BK 03283-LTS Commonwealth of Puerto Rico	30739	\$12,000.00*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.											

Five Hundred Twelfth Omnibus Objection

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CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
12 PACHECO RIVERA, MAGDA IVETTE PO BOX 3 YAUCO, PR 00698	05/16/18	17 BK 03283-LTS Commonwealth of Puerto Rico	16361	\$25,000.00*	PACHECO RIVERA, MAGDA I PO BOX 3 YAUCO, PR 00698-0003	05/16/18	17 BK 03283-LTS Commonwealth of Puerto Rico	19863	\$25,000.00*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.									
13 PIÑERO DIAZ, JAMES IDALIA N. LEON LANDRAU VILLA DEL REY 4 4 G 18 CALLE 2 CAGUAS, PR 00727-6704	05/22/18	17 BK 03283-LTS Commonwealth of Puerto Rico	21029	\$76,265.00	PINERO DIAZ, JAMES LCDA. IDALIA N. LEON LANDRAU VILLA DEL REY 4 4 G 18 CALLE 2 CAGUAS, PR 00727-6704	05/22/18	17 BK 03283-LTS Commonwealth of Puerto Rico	21134	\$76,265.00
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.									
14 PLUMEY SOTO, ENID CECILIA URB. LAS BRISAS 130 CALLE 3 ARECIBO, PR 00612	07/06/18	17 BK 03283-LTS Commonwealth of Puerto Rico	128204	\$75,000.00*	PLUMEY SOTO, ENID C. URB. LAS BRISAS 130 CALLE 3 ARECIBO, PR 00612	07/09/18	17 BK 03283-LTS Commonwealth of Puerto Rico	154214	Undetermined*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.									
15 QUINONEZ, ANGEL L PO BOX 13476 YAUCO, PR 00698	05/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	57865	Undetermined*	QUINONES BAEZ, ANGEL LUIS 452 AVENIDA PONCEDE LEON, EDIF. ASOCIACION DE MAESTROS, OFIC. 514 SAN JUAN, PR 00918	05/15/18	17 BK 03283-LTS Commonwealth of Puerto Rico	13429	\$33,964.39*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.									

Five Hundred Twelfth Omnibus Objection

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CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
16 RODRIGUEZ FELICIANO, WILLIAM 257 TARC DEL VALLE CIDRA, PR 00739	05/21/18	17 BK 03283-LTS Commonwealth of Puerto Rico	17370	Undetermined*	RODRIGUEZ FELICIANO, WILLIAM 452 AVENIDA PONCE DE LEON, EDIF. ASOCIACION DE MAESTROS, OFIC. 514 SAN JUAN, PR 00918	05/17/18	17 BK 03283-LTS Commonwealth of Puerto Rico	13900	\$33,162.58*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.									
17 ROMAN MIRANDA, HERIBERTO URB. IRLANDA HEIGHTS FK 47 CALLE SIRIO BAYAMON, PR 00956	06/28/18	17 BK 03283-LTS Commonwealth of Puerto Rico	63287	\$48,000.00*	ROMAN MIRANDA, HERIBERTO 452 AVENIDA PONCE DE LEON, EDIF. ASOCIACION DE MAESTROS, OFIC. 514 SAN JUAN, PR 00918	05/15/18	17 BK 03283-LTS Commonwealth of Puerto Rico	13917	\$33,047.56*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.									
Claim #63287 also contained on Exhibit A to the 316th Omnibus Claims Objection for Reclassified Claims.									
18 ROSADO, JOHANY ROSARIO C/JOSE Y. MENDEZ FG-22 6TA SECC. LEVITTOWN TOA BAJA, PR 00949	02/07/18	17 BK 03283-LTS Commonwealth of Puerto Rico	490	\$56,970.24	ROSARIO ROSADO, JOHANY C/O JOSE Y. MENDEZ FG-22 6TA SECC. LEVITTOWN TOA BAJA, PR 00949	04/27/18	17 BK 03283-LTS Commonwealth of Puerto Rico	9501	\$56,970.24
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.									

Five Hundred Twelfth Omnibus Objection

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CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT		NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
19	SANTANA BAEZ, ELIEZER 50 CARRETERA 5 UNIT ANEXO 501 EDIFICIO 3-J INDUSTRIAL LUCHETTI BAYAMON, PR 00961-7403	05/09/18	17 BK 03283-LTS Commonwealth of Puerto Rico	14973	\$75,000.00*		SANTANA BAEZ, ELIEZER PRO SE ELIEZER SANTANA BÁEZ 50 CARR. 5 UNIDAD ANEXO 501 EDIF. 3 J INDUSTRIAL LUCHETTI BAYAMÓN, PR 00961-7403	03/15/18	17 BK 03283-LTS Commonwealth of Puerto Rico	4245	\$75,000.00*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.											
20	VAZQUEZ SALOME, CARMEN HC-01 BOX 3404 VILLALBA, PR 00766	10/08/20	17 BK 03283-LTS Commonwealth of Puerto Rico	176473	\$1,200.00*		VASQUEZ SALOME, CARMEN M HC-01 BOX 3404 VILLALBA, PR 00766	03/10/20	17 BK 03283-LTS Commonwealth of Puerto Rico	173498	Undetermined*
Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.											